

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG - 4 1997

Before the  
Federal Communications Commission  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Regulatory Treatment of LEC Provision of  
Interexchange Services Originating in the LEC's  
Local Exchange Area

and

Policy and Rules Concerning the Interstate,  
Interexchange Marketplace

CC Docket No. 96-149

CC Docket No. 96-61

Petition for Clarification  
of GTE

GTE SERVICE CORPORATION AND ITS  
AFFILIATED DOMESTIC TELEPHONE  
OPERATING COMPANIES

Gail L. Polivy  
1850 M Street, N.W.  
Suite 1200  
Washington, DC 20036  
(202) 463-5214  
gpolivy @ dcoffice.gte.com

August 4, 1997

Michael Yourshaw  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, DC 20006-2304  
(202) 429-7028  
myourshaw@wrf.com

089

## Table of Contents

I. Background .....	2
II. The Order .....	7
III. The Commission should clarify that the term "interexchange" as applied to an independent LEC has an equivalent meaning to "interLATA" as applied to a BOC .....	8
A. The Order uses "interLATA" and "interexchange" to define the same long distance product market .....	8
B. The Order implicitly recognizes that intraLATA toll services are not included within "interexchange" services .....	10
C. There is no reasonable basis for subjecting independent LECs to more onerous restrictions than the BOCs .....	11
D. "Requiring the separation of toll services between "local calling areas" within an "exchange area" would impose costs without benefits .....	11
IV. Conclusion .....	14

## SUMMARY

The Order in this proceeding requires the BOCs to establish a separate subsidiary for interstate, "interLATA" services, and requires the independent LECs to establish a separate subsidiary for interstate, "interexchange" services. GTE requests clarification that the Commission intended "interLATA" and "interexchange" to mean the same thing, and that "interexchange" does not apply to toll service that is entirely within one LATA or "exchange area" (as independent non-BOC LATAs are called).

The court responsible for the AT&T and GTE Consent Decrees established "exchange areas" or LATAs, which include a number of local exchanges. Some of these "exchange areas" or LATAs cross state lines, and a very small portion of GTE's traffic is interstate, intraLATA toll. This traffic is provided on an integrated basis with intrastate, intraLATA toll and exchange service. It would be prohibitively expensive and disruptive to customer service to treat this traffic as "interexchange," which must be divested into a separate subsidiary.

The Order's policy analysis equates "interLATA" and "interexchange." This is consistent with the use of "interexchange" to mean interLATA in the *Competitive Carrier Fifth Report and Order*. The Order expresses no intention to define BOC and independent markets differently, and certainly not to impose more regulation on the independents than on the BOCs.

For these reasons, the Commission should clarify that the term "interexchange" as applied to an independent LEC has an equivalent meaning to "interLATA" as applied to a BOC.

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of

Regulatory Treatment of LEC Provision of  
Interexchange Services Originating in the LEC's  
Local Exchange Area

and

Policy and Rules Concerning the Interstate,  
Interexchange Marketplace

CC Docket No. 96-149

CC Docket No. 96-61

**PETITION FOR CLARIFICATION  
OF GTE**

GTE Service Corporation, and its affiliated domestic telephone operating companies,<sup>1</sup> (collectively "GTE") hereby files a Petition for Clarification of the Second Report and Order in CC Docket No. 96-149 and Third Report and Order in CC Docket No. 96-61.<sup>2</sup> This petition asks the Commission to clarify that the Order does not require the GTE telephone operating companies ("GTOCs") to provide their small amount of interstate, intraLATA toll service—which is provided on an integrated basis with intrastate, intraLATA toll service and exchange service—through a separate subsidiary.

---

<sup>1</sup> GTE Alaska, Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., and Contel of the South, Inc.

<sup>2</sup> FCC 97-142 (rel. April 18, 1997), 62 Fed. Reg. 35974 (July 3, 1997) ("Order").

Accordingly, GTE requests the Commission to specify that the term "interexchange" as applied to an independent local exchange carrier ("LEC") has an equivalent meaning to "interLATA" as applied to a Bell Operating Company ("BOC"). This interpretation is consistent with the *Competitive Carrier Fifth Report and Order*,<sup>3</sup> consent decree precedent, and the policies adopted in the Order. Treating "interexchange" to mean something materially different from "interLATA" would create unfair regulatory disparity between independent LECs and BOCs and could adversely impact customer service.

### **I. Background**

Prior to enactment of the Telecommunications Act of 1996,<sup>4</sup> orders of the United States District Court for the District of Columbia governed BOC and GTE provision of long distance service.

- BOCs and their affiliates were prohibited from providing "interexchange telecommunications services" by the court order that broke up the Bell system.<sup>5</sup>
- GTOCs were prohibited from providing "interexchange telecommunications services" by the court order that approved GTE's acquisition of Sprint.<sup>6</sup>

---

<sup>3</sup> Policy and Rules Concerning Rates for Competitive Common Carrier Services and Facilities Authorizations Therefor, CC Docket No. 79-252, Fifth Report and Order, 98 FCC 2d 1191 (1984) ("*Competitive Carrier Fifth Report and Order*").

<sup>4</sup> Pub. L. No. 104-104, 110 Stat. 56 (1996 Act), *codified at* 47 U.S.C. § 151 *et seq.* ("1996 Act")

<sup>5</sup> *United States v. Western Elec. Co.*, 552 F. Supp. 131, 227 (D.D.C. 1982), *aff'd sub nom.* *Maryland v. United States*, 460 U.S. 1001 (1983) ("AT&T Consent Decree").

<sup>6</sup> *United States v. GTE Corp.*, 1985-1 Trade Cas. (CCH) ¶ 66,355 at 64,775 (D.D.C. 1985) ("GTE Consent Decree") (the restriction did not prohibit GTE Hawaiian Telephone Company and General Telephone Company of Alaska from providing services between Hawaii and Alaska and offshore points).

- GTE Corporation was not restricted from owning other companies that were allowed to provide interexchange telecommunications services. The domestic, interstate, interexchange services of a carrier affiliated with a GTOC were regulated as non-dominant and subject to the *Competitive Carrier Fifth Report and Order* separation requirements.<sup>7</sup>

The term "interexchange telecommunications," which was used in both court orders, was defined to mean telecommunications between a point in one "exchange area" and another or a point outside such area.<sup>8</sup> "Interexchange telecommunications" was not synonymous with toll traffic. The court recognized that the local telephone companies would carry toll traffic within exchange areas.<sup>9</sup> "Exchange area," in turn, was defined as a geographic area established by a BOC or GTOC and meeting certain criteria, including that it "shall encompass one or more contiguous *local exchange areas* serving common social, economic, or other purposes, even where such configuration transcends municipal or other local governmental boundaries."<sup>10</sup> The district court was clear that "[e]ach GTE exchange area is required to meet specified criteria *which are identical* to those applied in the *AT&T* case for the establishment of the Bell Operating Company LATAs"<sup>11</sup>

---

<sup>7</sup> 98 FCC 2d at 1198, ¶ 9. Other local exchange carriers (non-BOC, non-GTOC) had the option of providing integrated domestic, interstate, interexchange services subject to dominant regulation or providing such services through a non-dominant *Competitive Carrier Fifth Report and Order* affiliate.

<sup>8</sup> See AT&T Consent Decree § IV(K); GTE Consent Decree § II(P).

<sup>9</sup> United States v. Western Elec. Co., 569 F. Supp. 990, 995 (D.D.C. 1983).

<sup>10</sup> GTE Consent Decree § II(H)(1) (emphasis added); see also AT&T Consent Decree § IV(G)(1).

<sup>11</sup> United States v. GTE Corp., 603 F. Supp. 730, 746 (D.D.C. 1984) (footnotes omitted)  
(Continued...)

One of the criteria for defining "exchange areas" was that they should not include points in more than one state without court approval. The court approved a number of "exchange areas" that crossed state boundaries in order to recognize an existing network configuration or to associate together in the same "exchange area" communities in two states that were closely bound by social and economic ties. Typically these state line exceptions fall into two classes: 1) a local exchange in one state that is associated with a tandem switch in another, (e.g., Pullman, Washington is associated with the Coeur D'Alene, Idaho LATA); or 2) a local exchange that straddles a state line, (e.g., a local exchange area in the Grand Island, Nebraska LATA straddles the Kansas state line).<sup>12</sup>

Although the BOC LATAs did not cover territory served by independent LECs, the court classified some independent exchanges as "associated" with a particular BOC LATA.<sup>13</sup> In addition, of course, the court recognized GTE "exchange areas" that were not associated with BOC LATAs.<sup>14</sup> Where a GTE exchange was associated with a BOC LATA, the court required that the GTE LATA associations be the same as those

---

(...Continued)  
(emphasis added).

<sup>12</sup> See Attachment 2.

<sup>13</sup> United States v. Western Elec. Co., 569 F. Supp. 1057, 1110-13 & n.234 (D.D.C. 1983); see Petitions for Limited Modification of LATA Boundaries To Provide Expanded Local Calling Service (ELCS) at Various Locations, CC Docket No. 96-159, Memorandum Opinion and Order, FCC 97-244 ¶ 4 (rel. July 15, 1997) ("*ELCS Order*"). Examples of GTOC exchanges associated with BOC LATAs include Lorton, VA and Dulles, VA in the Washington, DC LATA and Camas-Washougal, WA and Woodland, WA in the Portland, OR LATA.

<sup>14</sup> E.g., the Tampa Bay Area and Hawaii.

established in the AT&T Consent Decree.<sup>15</sup> Consequently, BOC LATAs and GTE "exchange areas" fall within the same geographic LATA boundaries.

The Coeur D'Alene, Idaho LATA is an example of how the independent LATAs were established. The northern panhandle of Idaho is not served by a BOC. This area was assigned LATA number 960, the initial "9" indicating that it is an independent LATA. This LATA includes a small portion of western Washington because some exchanges located in Washington share the same community of interest and common toll homing arrangements with the Idaho exchanges.<sup>16</sup>

The district court recognized that it was confusing to use the term "exchange area" to describe a geographic area that included a number of traditional "local exchange areas," and began to use the term "Local Access and Transport Area" or "LATA," instead of "exchange area," to describe the areas within which the BOCs and GTOCs would provide services.<sup>17</sup> Thus, the "interexchange" restriction came to be known as the "interLATA" restriction as applied to both the BOCs and GTOCs. "InterLATA" and "interexchange" had exactly the same meaning under the two consent decrees, as did "intraLATA" and "intraexchange."

The 1996 Act removed the restrictions of the AT&T Consent Decree<sup>18</sup> and the GTE Consent Decree.<sup>19</sup> It authorized BOCs to provide in-region, "interLATA" services

---

<sup>15</sup> 603 F. Supp. at 748.

<sup>16</sup> United States v. GTE Corp., Civil Action No. 83-1298, GTE Corporation Exchange Area Submission (July 5, 1983, revised Nov. 21, 1983). See map in Attachment 2.

<sup>17</sup> 569 F. Supp. at 993 & n.9. See United States v. GTE Corp., 1992 U.S. Dist. LEXIS 4781, at \*4 (D.D.C. March 25, 1992) ("GTE serves 101 LATAs").

<sup>18</sup> 1996 Act § 601(a)(1).

<sup>19</sup> *Id.* § 601(a)(2).



through a separate affiliate, subject to various conditions and Commission approval. The Act did not impose any separate affiliate requirements on the independent LECs, including the GTOCs. Once the GTE Consent Decree was replaced by the 1996 Act, the *Competitive Carrier Fifth Report and Order* applied to the GTOCs in the same way it applied to other non-BOC LECs—the GTOCs could provide domestic, interstate, interexchange services on either an integrated (dominant) or separated (non-dominant) basis.

The 1996 Act defined “local access and transport area” or “LATA” only in terms of the BOC LATAs established under the AT&T Consent Decree.<sup>20</sup> Because the 1996 Act did not impose any long distance restrictions on the GTOCs, it is not surprising that the definition of “LATA” was limited to BOC LATAs, and that “exchange area” for independent LECs was not defined in the legislation.

In the context of the *Competitive Carrier Fifth Report and Order*, the term “interexchange” referred to traffic that was interLATA, or in GTE’s case inter-“exchange area.” For example, it referred to “restrictions on the *interexchange services* offered by the Bell operating Companies (BOCs) and GTE ... developed out of antitrust proceedings ... .”<sup>21</sup> It has been the uniform and consistent practice since that order to regard its rules relating to “interexchange” service as only applying to those interstate services that crossed LATA or “exchange area” boundaries.

Subsequently the Commission has stated, “LATAs define the geographic areas within which a BOC may provide service.”<sup>22</sup> The Commission also recognizes that a

---

<sup>20</sup> 47 U.S.C. § 153(25).

<sup>21</sup> 98 F.C.C.2d at 1197 (emphasis added).

<sup>22</sup> *ELCS Order* n.2.

"local calling area" consists of "one or more telephone exchanges and is an area within which subscribers can place calls without incurring any additional charge over their regular monthly service charge."<sup>23</sup> However, the Commission has not adopted unambiguous terminology to refer to toll service between such "local calling areas" when that service is within a single LATA.

## II. The Order

The Order adopts as a relevant product market definition "long distance services," which, according to the Order, means "interstate, domestic or international, *interLATA* services" in the case of the BOCs and means "interstate, domestic or international, *interexchange* services" in the case of independent LECs such as GTOCs.<sup>24</sup>

The Order declared that BOC *interLATA* affiliates should be classified as non-dominant in the provision of in-region, "interLATA" services<sup>25</sup> and that independent LECs should be classified as non-dominant in the provision of in-region, "interexchange" services.<sup>26</sup>

The Order also required independent LECs to provide in-region, "interexchange" services through a separate affiliate that satisfies the *Competitive Carrier Fifth Report and Order*, and removed the option of providing such services on an integrated basis subject to dominant regulation.<sup>27</sup>

---

<sup>23</sup> *Id.* n.4.

<sup>24</sup> Order ¶ 5 (emphasis added).

<sup>25</sup> *Id.* ¶¶ 6, 82.

<sup>26</sup> *Id.* ¶¶ 7, 143.

<sup>27</sup> *Id.* ¶ 173.

**III. The Commission should clarify that the term "interexchange" as applied to an independent LEC has an equivalent meaning to "interLATA" as applied to a BOC**

GTE requests that the Commission clarify that the term "interexchange," as applied to GTE, refers to telecommunications between a point located in a GTE "exchange area" and a point located outside such area.<sup>28</sup> For this purpose, a GTE "exchange area" is one of the "exchange areas" established in the GTE Consent Decree under criteria identical to BOC LATAs, as those areas have been subsequently modified by court or state regulatory commission order.<sup>29</sup> (While these GTE "exchange areas" are still usually referred to as "LATAs" in the industry, this pleading will use the "exchange area" terminology for clarity. GTE "exchange areas" are listed in Attachment 1 and depicted on maps in Attachment 2.)

**A. The Order uses "interLATA" and "interexchange" to define the same long distance product market**

The Order creates an ambiguity by referring to BOC "interLATA" services and independent LEC "interexchange" services to characterize their respective long distance activities, even though the Order nowhere suggests that it is dealing with different product markets in the case of BOCs and independent LECs. This distinction in terminology apparently is due to the fact that the 1996 Act defines "interLATA" only with reference to BOC LATAs and the Commission may not have considered it accurate to use the term "LATA" with respect to independent LECs. However, by referring to the

---

<sup>28</sup> Cf. 47 U.S.C. § 153(21) (definition of "InterLATA Service").

<sup>29</sup> As indicated above, some of these "exchange areas" are BOC LATAs with which GTE exchanges are associated and some are independent LEC designated LATAs or "exchange areas." The independent LECs were assigned the 900 series of LATA numbers while offshore and other international points were assigned the 800 series. (See Bellcore's BOC Notes on the LEC Networks, Section 2.)

"interexchange" services of independent LECs, the undefined term "interexchange" could refer to traffic between geographically-determined "exchange areas" as they were defined in the GTE Consent Decree, *i.e.*, areas equivalent to LATAs, or could refer to all toll traffic between the much smaller "local exchange areas" or "local calling areas" which are included within an "exchange area."<sup>30</sup>

The Order shows no intention to define different product markets for BOCs and independent LECs. Indeed, the Order describes a single product market, "long distance services," as follows:

In places where we use the term "long distance services," we mean interstate, domestic or international, interLATA services provided by the BOC interLATA affiliates and interstate, domestic or international, interexchange services provided by independent LECs, respectively.<sup>31</sup>

This definition only make sense if independent LEC "interexchange" services are equivalent to BOC "interLATA" services.

In discussing the product market definition, the Order uses the terms "interexchange" and "interLATA" as virtual equivalents. For example, "[w]e are aware of no evidence, nor has any commenter presented any such evidence in the record, that suggests that there is a particular interexchange service or group of services that will be provided by BOC interLATA affiliates or independent LECs with respect to which there is or could be a lack of competitive performance."<sup>32</sup> The Order uniformly treats

---

<sup>30</sup> Compare the definition of "telephone exchange service," meaning service within a telephone exchange, or within a series of connected telephone exchanges covered by the exchange service charge. 47 U.S.C. § 153(47).

<sup>31</sup> Order n.19.

<sup>32</sup> *Id.* ¶ 50.

independent LEC "interexchange" service and BOC "interLATA" service as the same product, namely long distance service. There is no suggestion that the Order is intended to address different products, *i.e.*, toll service between "local exchange areas" or "local calling areas," in the case of independent LECs, and interLATA service in the case of the BOCs. If there had been any such intent to differentiate these products, it is inexplicable that the Order does not also discuss the regulatory treatment of BOC intraLATA, inter-"local calling area" toll service.

**B. The Order implicitly recognizes that intraLATA toll services are not included within "interexchange" services**

The Order recognizes that it will require "interexchange" services now offered by independent LECs on an integrated, dominant basis to be separated into *Competitive Carrier Fifth Report and Order* affiliates.<sup>33</sup> Specifically, with respect to GTE, the Order refers to the integrated "interexchange" services of GTE Hawaiian Telephone Company, Inc. ("GTE Hawaiian Tel"), and only to those services. Those services are, of course, interstate or international services where GTE Hawaiian Tel is the carrier for calls that originate in Hawaii and terminate elsewhere; *i.e.*, insular U.S. points or foreign countries and, for which, the Commission recently reclassified GTE Hawaiian Tel as a nondominant interexchange carrier subject to the formation of a *Competitive Carrier Fifth Report and Order* affiliate.<sup>34</sup> The Order does not refer to the toll services between "local calling areas" within an "exchange area," which the GTOCs have provided for many years on an integrated dominant basis.<sup>35</sup> Thus, the Order plainly does not regard

---

<sup>33</sup> Order ¶ 173.

<sup>34</sup> See Petition of GTE Hawaiian Telephone Company, Inc. for Reclassification as a Non-dominant IMTS Carrier, Order, DA 96-1748 (rel. Oct. 22, 1996).

<sup>35</sup> For example, Coeur D'Alene, ID to Pullman, WA is an interstate intraLATA toll call  
(Continued...)

such services as "interexchange" or it would surely have discussed them, as well as the Hawaii services, in its analysis of this issue.

**C. There is no reasonable basis for subjecting independent LECs to more onerous restrictions than the BOCs**

There is no record justification for subjecting independent LECs to *as much* regulation as the BOCs, and certainly no justification for subjecting them to *more*. Yet that would be the unintended consequence of erroneously reading "interexchange" to refer to toll service within an "exchange area" between "local calling areas." Under that reading, independent LEC interstate toll traffic in an "exchange area" would have to be provided by a *Competitive Carrier Fifth Report and Order* affiliate, but the BOCs would be allowed to provide interstate, intraLATA toll on an integrated basis. The Order contains no rationale—nor could it, for the record is barren—for laying a heavier regulatory hand on independent LECs.<sup>36</sup> At the very least the Commission should clarify that it did not intend to require separate affiliates for more independent LEC services than BOC services.

**D. Requiring the separation of toll services between "local calling areas" within an "exchange area" would impose costs without benefits**

The GTOCs carry only a small amount of interstate intraLATA toll traffic between "local calling areas" within an "exchange area." Even if there were some theoretical or speculative benefit from providing this service in a *Competitive Carrier Fifth Report and*

---

(...Continued)

where both exchanges belong to GTE and has been tariffed as such with the FCC since 1984. (See FCC Tariff GTOC No. 2.)

<sup>36</sup> GTE supports the Petition for Reconsideration of United States Telephone Association, being filed today, which urges the Commission not to require legally separate affiliates for independent LEC provision of long distance service.

*Order* affiliate, the amount of service affected is so small that the public interest gain would be undetectable. GTOCs provide interstate, intra-"exchange area" service in 42 different "exchange areas" in twenty-three states. (See Attachment 1.) Interstate revenues from these services are roughly \$29 million, or 0.2 percent of GTE's total telephone operating revenues and sales. Further, this amount represents 0.12 percent of nationwide interstate revenues. These services have been provided on an integrated, dominant basis for years. Where the GTOCs have interstate toll tariffs filed with the FCC,<sup>37</sup> the GTOCs are under price cap regulation.

If GTE were required to provide these services through a *Competitive Carrier Fifth Report and Order* affiliate, there would be substantial costs and service disruption imposed on consumers. At present, the GTOCs provide toll services within an "exchange area" using local exchange transmission facilities and switches. This traffic is fully integrated with other local exchange and intrastate toll traffic. Because the facilities and switches are needed for local services they cannot be transferred to a long distance affiliate. Nor does GTE have any other non-GTOC switching and transmission capacity that could provide these services.

The only way GTE could provide these services consistently with the *Competitive Carrier Fifth Report and Order* would be to construct new transmission and switching facilities. Such construction would be extremely costly, and could not be economically justified by the small amount of traffic and revenue.

---

<sup>37</sup> Coeur d'Alene, ID and Terre Haute, IN "exchange areas" since 1984 and eight new states as of the first of this year. (See FCC Tariff GTOC No. 2.) In other areas, GTE bills the end user customer the applicable toll charge (usually the BOC rate) and then has some type of settlement arrangement with the other LEC for reimbursement. Sometimes this is access charges, sometimes this is bill and keep.

For these reasons, if GTE were forced to separate interstate toll traffic between "local calling areas" within an "exchange area," GTE would be forced to cease providing this service altogether. This would leave the GTOC providing intrastate toll service within the "exchange area," but not interstate toll. However, there is no way for a customer to select one primary interexchange carrier (PIC) for interstate intra-"exchange area" traffic and another for intrastate intra-"exchange area" toll; the choices are for all of interLATA and for all of intraLATA (both interstate and intrastate).<sup>38</sup> Thus customers would be unable to obtain from GTE a service for all calls within the entire LATA.

The district court recognized the need for GTOC exchange areas comparable in size to those of the BOCs. Among many other reasons, the court noted that "the establishment of larger exchange areas is more likely to result in greater efficiencies in the provision of exchange services and avoid significant rearrangement costs that would otherwise be incurred if integrated local networks were severed by LATA or exchange boundaries."<sup>39</sup> For the same reasons, the Order should not be interpreted to require the splitting up of GTOC "exchange areas" into smaller "local calling areas."

---

<sup>38</sup> Dialing parity requirements are based on LATAs even for independent LECs like GTE that do not technically have LATAs. Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, Second Report and Order and Memorandum Opinion and Order, FCC 96-333, (rel. Aug. 8, 1996).

<sup>39</sup> United States v. GTE Corp., 603 F. Supp. at n.69.



#### IV. Conclusion

For the reasons given above, GTE urges the Commission to clarify that the term "interexchange" as applied to an independent LEC has an equivalent meaning to "interLATA" as applied to a BOC.

Respectfully submitted,

GTE SERVICE CORPORATION AND ITS  
AFFILIATED DOMESTIC TELEPHONE  
OPERATING COMPANIES

By: 

Gail L. Polivy  
1850 M Street, N.W.  
Suite 1200  
Washington, DC 20036  
(202) 463-5214  
gpolivy @ dcoffice.gte.com

August 4, 1997

Michael Yourshaw  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, DC 20006-2304  
(202) 429-7028  
myourshaw@wrf.com  
Their Attorneys

**ATTACHMENT 1**  
**LATAs Where GTE Has "Exchange Areas"**

<b>LATA</b>	<b>LATA NAME</b>	<b>GTE Interstate, IntraLATA Toll Traffic (•)</b>
133	Poughkeepsie, New York	•
138	Binghamton, New York	•
226	Harrisburg, Pennsylvania	
228	Philadelphia, Pennsylvania	•
230	Altoona, Pennsylvania	
232	Northeast Pennsylvania	
234	Pittsburgh, Pennsylvania	
236	Washington, DC	•
244	Roanoke, Virginia	
246	Culpeper, Virginia	
248	Richmond, Virginia	
250	Lynchburg, Virginia	•
252	Norfolk, Virginia	•
320	Cleveland, Ohio	
324	Columbus, Ohio	
325	Akron, Ohio	
326	Toledo, Ohio	
328	Dayton, Ohio	
330	Evansville, Indiana	
332	South Bend, Indiana	
334	Auburn-Huntington, Indiana	
336	Indianapolis, Indiana	
338	Bloomington, Indiana	
340	Detroit, Michigan	
344	Saginaw, Michigan	
346	Lansing, Michigan	
348	Grand Rapids, Michigan	
350	Northeastern Wisconsin	
352	Northwestern Wisconsin	•
354	Southwestern Wisconsin	•
356	Southeastern Wisconsin	
358	Chicago, Illinois	•

\* In LATAs beginning with 1-7 GTE exchanges are associated with a BOC LATA; LATAs beginning with 9 are independent LEC LATAs; LATAs beginning with 8 are offshore or international LATAs.

LATA	LATA NAME	GTE Interstate, IntraLATA Toll Traffic (•)
360	Rockford, Illinois	
362	Cairo, Illinois	
364	Sterling, Illinois	
366	Forrest, Illinois	
368	Peoria, Illinois	
370	Champaign, Illinois	
374	Springfield, Illinois	
376	Quiney, Illinois	
420	Asheville, North Carolina	
422	Charlotte, North Carolina	•
426	Raleigh, North Carolina	
430	Greenville, South Carolina	
432	Florence, South Carolina	
434	Columbia, South Carolina	
436	Charleston, South Carolina	
442	Augusta, Georgia	•
462	Louisville, Kentucky	•
464	Owensboro, Kentucky	
466	Winchester, Kentucky	
476	Birmingham, Alabama	
477	Huntsville, Alabama	•
478	Montgomery, Alabama	•
480	Mobile, Alabama	
520	St. Louis, Missouri	•
521	Westphalia, Missouri	
522	Springfield, Missouri	•
524	Kansas City, Missouri	•
526	Fort Smith, Arkansas	•
528	Little Rock, Arkansas	•
530	Pine Bluff, Arkansas	•
536	Oklahoma City, Oklahoma	
538	Tulsa, Oklahoma	
540	El Paso, Texas	•
542	Midland, Texas	
544	Lubbock, Texas	
546	Amarillo, Texas	•
548	Wichita Falls, Texas	
550	Abilene, Texas	
552	Dallas, Texas	
554	Longview, Texas	•
556	Waco, Texas	
558	Austin, Texas	

LATA	LATA NAME	GTE Interstate, IntraLATA Toll Traffic (•)
560	Houston, Texas	
562	Beaumont, Texas	
564	Corpus Christi, Texas	
566	San Antonio, Texas	
568	Brownsville, Texas	
570	Hearne, Texas	
620	Rochester, Minnesota	•
624	Duluth, Minnesota	•
626	St. Cloud, Minnesota	•
628	Minneapolis, Minnesota	
630	Sioux City, Iowa	•
632	Des Moines, Iowa	•
634	Davenport, Iowa	•
635	Cedar Rapids, Iowa	•
636	Brainerd-Fargo, North Dakota	•
644	Omaha, Nebraska	•
646	Grand Island, Nebraska	•
664	New Mexico	
670	Eugene, Oregon	•
672	Portland, Oregon	•
674	Seattle, Washington	
676	Spokane, Washington	•
720	Reno, Nevada	•
722	San Francisco, California	
724	Chico, California	
726	Sacramento, California	
728	Fresno, California	
730	Los Angeles, California	•
734	Bakersfield, California	
738	Stockton, California	
740	San Luis Obispo, California	
834	Hawaii	
922	Cincinnati, Ohio	•
923	Lima-Mansfield, Ohio	
924	Erie, Pennsylvania	
927	Harrisonburg, Virginia	
932	Bluefield, West Virginia	
937	Richmond, Indiana	•
938	Terre Haute, Indiana	•
952	Tampa, Florida	
960	Couer D'Alene, Idaho	•
961	San Angelo, Texas	

<b>LATA</b>	<b>LATA NAME</b>	<b>GTE Interstate, IntraLATA Toll Traffic (•)</b>
973	Palm Springs, California	
976	Mattoon, Illinois	
977	Macomb, Illinois	
978	Olney, Illinois	

## **ATTACHMENT 2**

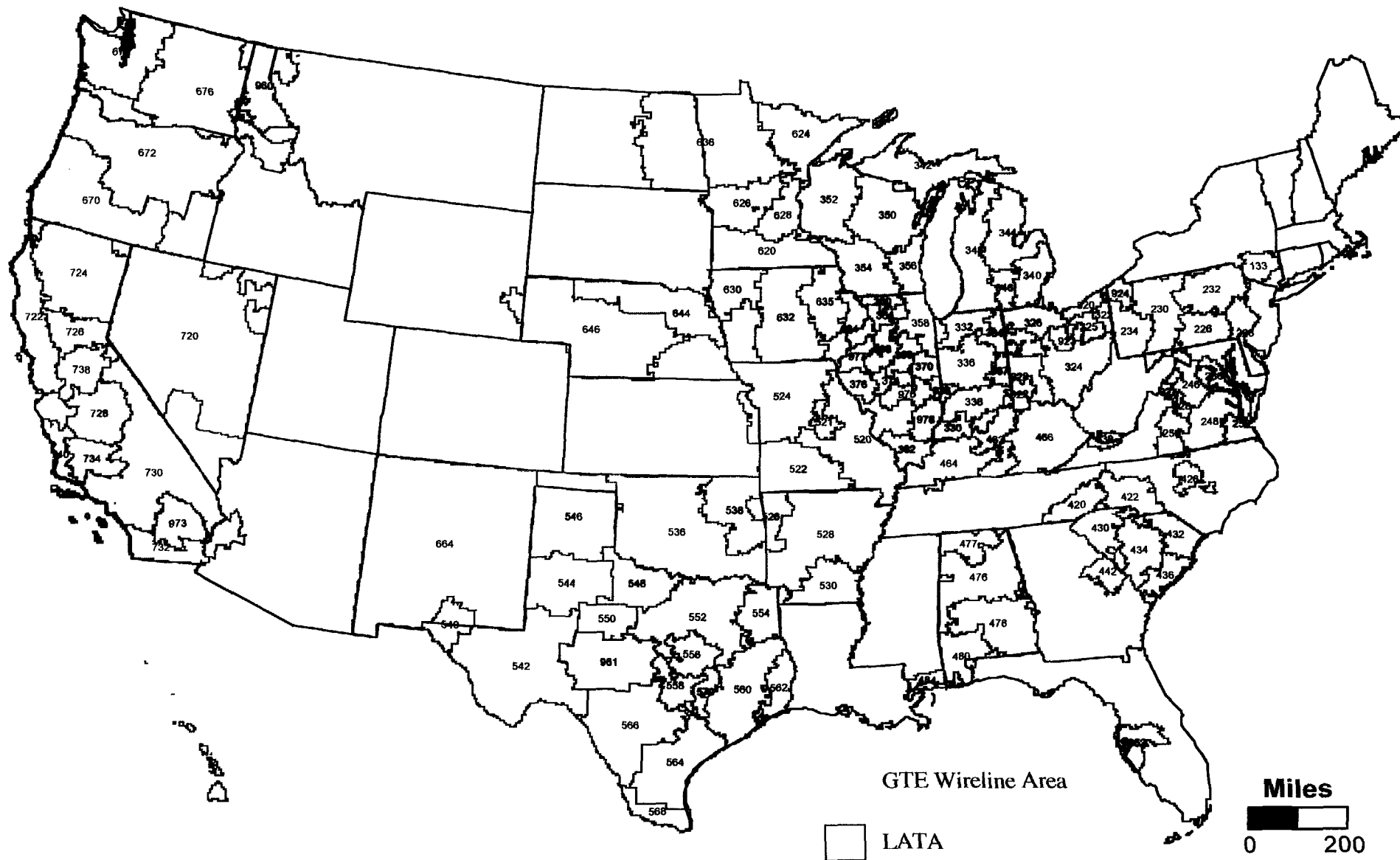
### **LATA Maps\***

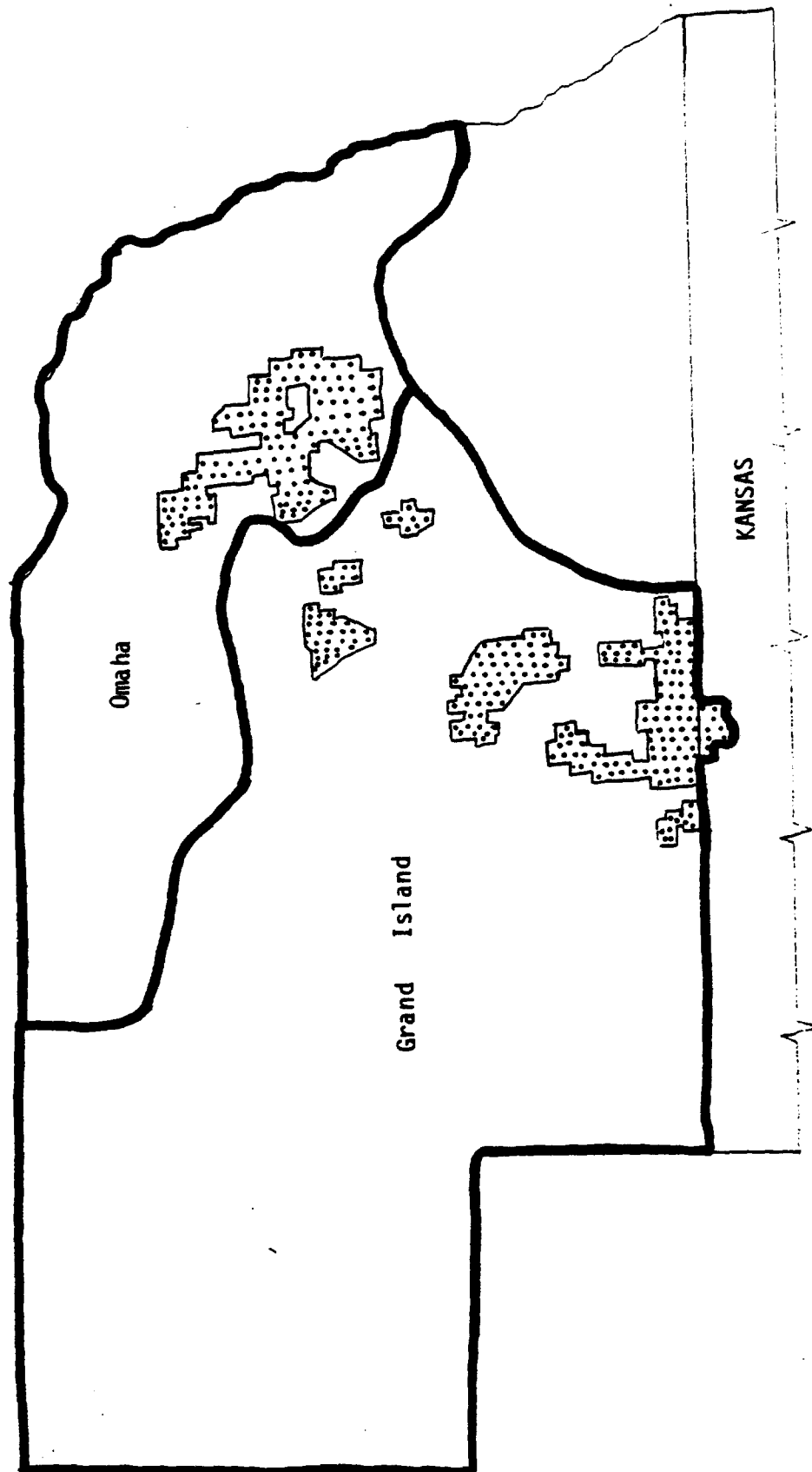
1. GTE Exchange Areas and LATA Boundaries
2. Coeur D'Alene, Idaho LATA
3. Grand Island, Nebraska LATA

---

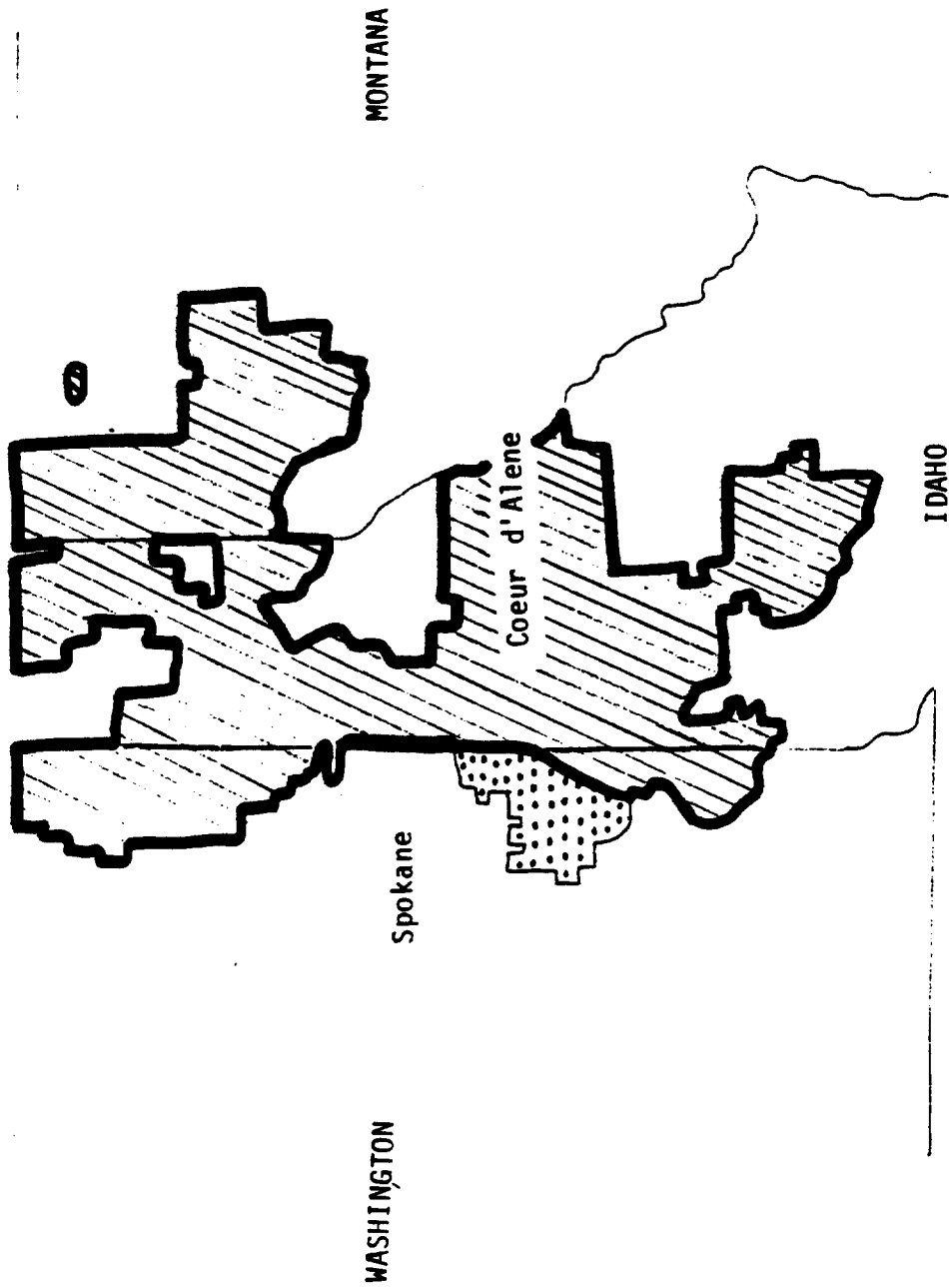
\* Note: This Attachment contains a U.S. map that shows GTE "exchange areas" and LATA boundaries. On this map, LATAs with no GTE service are not shown. In addition, the individual LATA maps for Idaho and Nebraska are taken from GTE's 1983 submission to the antitrust court. See n.16 *infra*. These maps are for illustrative purposes only and may not precisely show present conditions.

# ***GTE Wireline Area & LATAs***









USDA APPROVAL OF BLUEBELL 6/7/85